IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES	OF AM	ERICA)
V.)) Criminal Number 03-501-A
STEVEN Y. LEE,))
Defendant)

CRIMINAL INFORMATION

Count 1: Conspiracy to Commit Immigration Fraud

THE UNITED STATES ATTORNEY CHARGES THAT:

From on or about October 21, 1999, through on or about December 11, 2001, in the Eastern District of Virginia, the defendant, STEVEN Y. LEE, knowingly and unlawfully conspired with Jordan N. Baker, and others known to the government to commit an offense against the United States and one or more of the same persons did an act to effect the object of the conspiracy. Specifically, from on or about October 21, 1999, through on or about December 11, 2001, in Fairfax, Virginia, the defendant knowingly and unlawfully conspired with Jordan N. Baker and others to commit immigration fraud and took direct steps to commit the fraud. In particular, the defendant and his fellow conspirators knowingly and unlawfully agreed to subscribe as true, under penalty of perjury (as permitted under Title 28, United States Code, Section 1746), a false statement with respect to a material fact in an application and document required by the immigration laws and the regulations prescribed thereunder, and to present such application and document which contained such a false statement and which failed to contain any

reasonable basis in law and fact, in violation of Title 18, United States Code, Section 1546. In furtherance of this same conspiracy, the defendant and his fellow conspirators knowingly prepared immigration applications containing false statements and declarations and presented these same applications to the Immigration and Naturalization Service for adjudication. (In violation of Title 18, United States Code, Sections 371 and 1546(a).)

Count 2: Money Laundering

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about March 18, 2002, in the Eastern District of Virginia, the defendant, STEVEN Y. LEE, unlawfully and knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, which transaction involved the proceeds of a specified unlawful activity, with the intent to promote the carrying on of said specified unlawful activity, and that while conducting and attempting to conduct this financial transaction, the defendant knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. Specifically, on or about March 18, 2002, in Fairfax, Virginia, the defendant wrote a check directing the Bank of America to transfer the sum of \$910.78 from one of the defendant's business accounts at the Bank of America branch in Fairfax, Virginia (account number 0041-1889-1110 in the name of Lee, Baker & Warren, PLLC), to Jane Doe in order to create a false record of employment for Jane Doe. At the time of this transaction, the defendant knew that the funds transferred to Jane Doe involved the proceeds of the defendant's illegal activities to commit labor certification fraud, in violation of Title 18, United States Code, Section 1546, and intended his payment to Jane Doe to promote these same illegal activities. Title 18, United States Code, Section 1546, is a specified unlawful activity as that term is defined in Title 18, United States Code, Section 1956(c)(7)(A).

(In violation of Title 18, United States Code, § 1956(a)(1)(A)(i).)

Criminal Forfeiture

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

Upon conviction of the offense charged in count 1 of this information, the defendant, STEVEN Y. LEE, shall forfeit to the United States any property, real or personal, that constitutes, or is derived from, or is traceable to the proceeds obtained directly or indirectly from the commission of this offense, up to and including a sum of \$800,000.

(Pursuant to Title 18, United States Code, Section 982(a)(6).)

PAUL J. MCNULTY UNITED STATES ATTORNEY

By:

John T. Morton Assistant United States Attorney